

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

Alexander Nelson,

Case No. 23-cv-525 NEB/JFD

Plaintiff,

v.

American Modern Insurance Group, Inc.,  
NCM Insurance Agency, LLC,

Defendants.

---

**AMERICAN MODERN INSURANCE  
GROUP, INC.'S NOTICE OF  
HEARING ON ITS MOTION TO  
COMPEL COMPLIANCE WITH A  
RULE 45 SUBPOENA TO NON-  
PARTY ANN OLSON**

**PLEASE TAKE NOTICE** that on April 11, 2024, at 9:00 AM CST, via ZOOM, Defendant American Modern Insurance Group, Inc. (“American Modern”) will move this Court for an Order (a) compelling non-party Ann Olson to produce all responsive documents and information in response to Defendants’ Rule 45 Subpoena Duces Tecum, and (b) compelling non-party Ann Olson to sit for an in-person deposition at a date to be determined based on Ms. Olson’s document production and availability.

Dated: March 14, 2024

/s/ *Diego E. Garcia*  
Larry E. LaTarte (0397782)  
Diego E. Garcia (0403581)  
Counsel for Defendant American Modern  
Insurance Group, Inc.  
**FAEGRE DRINKER BIDDLE &  
REATH LLP**  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Tel. (612) 766-7000  
Fax (612) 766-1600  
Larry.LaTarte@faegredrinker.com  
Diego.Garcia@faegredrinker.com